

JOSEPH B. SALA, Ph.D.

1 Q. Yes.

2 A. It can be.

3 Q. How big are these bolts? You said  
4 you've noticed them in the pictures.

5 A. I don't know a size dimension of them.

6 Q. Well, if you got a bolt that's, say,  
7 an inch, inch and a half long sticking out on a  
8 huge piece of equipment, do you think that's open  
9 and obvious?

10 A. It can be.

11 Q. And what do you base that on?

12 A. That it can be?

13 Q. That's a subjective opinion, correct?

14 A. I -- I -- I'm sorry, I don't think --

15 Q. Are you saying it's a --

16 A. -- I was expressing an opinion there.

17 Q. Are you saying it's a possibility?  
18 You're saying it can be.

19 A. Well, you're -- you're talking about  
20 the potential for a bolt to be obvious against a  
21 shaft, and yes, it -- it can be depending on -- on  
22 what the features are surrounding that.

23 Q. What evidence, objective evidence, in  
24 this case did you have that Mr. Coggins

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Exhibit 14

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1 appreciated or noticed the projecting bolt?

2 A. I am not relying on any piece of  
3 information to suggest that.

4 Q. You have no evidence in that regard,  
5 correct?

6 A. I -- I have never stated I did.

7 Q. You have no evidence whatsoever,  
8 objective evidence, that Mr. Coggins himself saw  
9 the bolt or appreciated the hazard, correct?

10 A. I have no evidence, and nor have I  
11 claimed that there is evidence that he saw a bolt.

12 Q. You make a statement in your report  
13 about his level of experience. I'm looking on  
14 page 11. It says, Given the conditions under  
15 which Mr. Coggins was performing maintenance at  
16 the time of the incident, his level of experience  
17 and training, information seeking behavior, and  
18 willingness to engage in risky and prohibited  
19 behaviors despite verbal warnings and instructions  
20 to the contrary, and then it goes on and on and  
21 on.

22 A. Uh-huh.

23 Q. Are you with me on that?

24 A. Yes, I am.

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